

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

AURELIO TARAZONA CARVAJAL,	§	
EDUAR HURTADO GARCIA,	§	
ELKIN HUMBERTO GÓMEZ PINTO,	§	
FREDY ALEXANDER HERRERA	§	
PICO, JAIRO ANDRÉS ARDILA	§	
PEÑA, JORGE ELIECER DIAZ	§	
GALVIS, WILSON FABIAN PEÑA	§	Civil Action No. 3:23-cv-00245-RFC
CASTILLO, JUAN DAVID GARCÍA	§	
RODRIGUEZ	§	
<i>Plaintiffs</i>	§	
	§	
v.	§	
	§	
	§	
MIJELUM, L.L.C.	§	

DEFENDANT’S DESIGNATION OF POTENTIAL WITNESSES

Pursuant to the Second Amended Scheduling Order entered in connection with the above-referenced action, Defendant, Mijelum, designates the following potential witnesses who will or may be called upon to testify at the trial of this matter:

1. Leon Miguel Mucharraz
C/o Joe A. Spencer, Esq.
1009 Montana Ave.
El Paso, Texas 79902
915-532-5562
Defendant and owner of Mijelum
Defendant and owner of Mijelum, LLC, may testify about claims and defenses in this case.

2. Luis Mucharraz
C/o Joe A. Spencer, Esq.
1009 Montana Ave.
El Paso, Texas 79902
915-532-5562
Owner of Mijelum, L.L.C.
Defendant and owner of Mijelum
Defendant and owner of Mijelum, LLC, may testify about claims and defenses in this case.
3. Haynie & Company
Joe Torres, CPA
Amanda Martinez
5000 E. University Blvd. Ste 3
Odessa Texas 79762
432-230-5708
Accountant for Mijelum, LLC
It is anticipated that Mr. Torres may testify regarding his opinions on the Plaintiffs' and the Defendant's State and Federal Tax Returns, Financial Statements, Bank Accounts, Accounts Receivables, and Accountant Payables.
4. Joe A. Spencer, Esq.
1009 Montana Ave.
El Paso, Texas 79902
915-532-5562
Defendant's attorney
Attorney for Defendant may testify as to his knowledge regarding reasonable and necessary attorney's fees and expenses related to Defendant's defenses, claims, expert fees, court costs and expenses. May also testify regarding the applicable laws and facts as they relate to Defendant's defenses and claims.
5. Aurelio Tarazona Carvajal
C/o Adam Poncio. Esq.
Alan Braun, Esq.
PONCIO LAW OFFICES
5410 Fredericksburg Road, Suite 109
San Antonio, Texas 78229-3550
(210) 212-7979
Plaintiff

6. Eduar Hurtado Garcia
C/o Adam Poncio. Esq.
Alan Braun, Esq.
PONCIO LAW OFFICES
5410 Fredericksburg Road, Suite 109
San Antonio, Texas 78229-3550
(210) 212-7979
Plaintiff
7. Elkin Humberto Gomez Pinto
C/o Adam Poncio. Esq.
Alan Braun, Esq.
PONCIO LAW OFFICES
5410 Fredericksburg Road, Suite 109
San Antonio, Texas 78229-3550
(210) 212-7979
Plaintiff
8. Fredy Alexander Herrera Pico
C/o Adam Poncio. Esq.
Alan Braun, Esq.
PONCIO LAW OFFICES
5410 Fredericksburg Road, Suite 109
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(210) 212-7979
Plaintiff
9. Jairo Andres Ardila
C/o Adam Poncio. Esq.
Alan Braun, Esq.
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Plaintiff
10. Jorge Eliecer Diaz Galvis
C/o Adam Poncio. Esq.
Alan Braun, Esq.
PONCIO LAW OFFICES
5410 Fredericksburg Road, Suite 109
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(210) 212-7979
Plaintiff

11. Wilson Fabian Pefia Castillo
C/o Adam Poncio. Esq.
Alan Braun, Esq.
PONCIO LAW OFFICES
5410 Fredericksburg Road, Suite 109
San Antonio, Texas 78229-3550
(210) 212-7979
Plaintiff

12. Juan David Garcia Rodriguez
C/o Adam Poncio. Esq.
Alan Braun, Esq.
PONCIO LAW OFFICES
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San Antonio, Texas 78229-3550
(210) 212-7979
Plaintiff

Defendant incorporates any and all witnesses, fact or expert, disclosed by any party in its responses to requests for disclosure or identified in discovery, to include any and all depositions (to include all deposition exhibits) which have been taken prior to this response and/or subsequent to this response.

Defendant incorporates by reference each and all individuals named or identified by any party in the discovery process, to include those identified through documents or deposition testimony.

Defendant reserves its rights and will supplement in accordance with the Federal Rules of Civil Procedure if deemed necessary.

Respectfully submitted,

JOE A. SPENCER JR., ESQ.
ATTORNEY & COUNSELOR AT LAW
1009 Montana Ave.
El Paso, TX 79902
Tel. (915) 532-5562
Fax. (915) 532-7535

/s/ Joe A. Spencer

Joe A. Spencer, Esq.
Texas Bar No. 18921800
joe@joespencerlaw.com

ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

On January 10, 2024, a true and correct copy of this document served on all counsel of record via the Court's electronic filing system.

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Alan Braun, Esq.
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/s/ Joe A. Spencer
Joe A. Spencer, Esq.